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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA

Case No. 3:22-cr-00084-SI

v.

TONY DANIEL KLEIN,

Defendant.

**MOTION FOR UNOPPOSED
PROTECTIVE ORDER AS TO
PARTICULAR DISCOVERY**

The United States respectfully moves the Court to enter an additional Protective Order in this case, which will govern the disclosure of particular documents. Counsel for the defendant has reviewed and does not object to the Proposed Order.

The United States recently learned sensitive law-enforcement information related to a potential witness in this case. The United States has disclosed the general nature of the information to the defense and obtained, but not yet provided, relevant documents describing this information. The United States believes a protective order that contains additional restrictions is appropriate for

the disclosure of these particular documents, due to their sensitive nature. The proposed protective order will govern the disclosure of Volume 9 of discovery, which will contain only the sensitive documents, as well as any subsequent productions related to the same subject matter.

Dated: June 7, 2023

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Gavin W. Bruce
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